

Adam R. Pechtel / WSBA #43743
Pechtel Law PLLC
21 N Cascade St
Kennewick, WA 99336
Telephone: (509) 586-3091

Attorney for Defendant

United States District Court
Eastern District of Washington
Before the Hon. Stanley A. Bastian

United States of America,

Plaintiff,

v.

Johnny Manuel Savala,

Defendant.

No. 4:20-CR-06002-SAB-4

Motion to Continue Pretrial,
Trial and Extend Deadline to
File Pretrial Motions

Without oral argument
June 10, 2020 at 6:00 PM

Mr. Savala, through his attorney of record, moves the Court to continue the pretrial conference date currently set for June 17, 2020 to September 9, 2020 and the trial date that is currently set for July 13 to September 28, 2020 at 9:00 AM. Mr. Savala's attorney contacted AUSA Stephanie A. Van Marter and counsel for the co-defendants, Jeremy B. Sporn, Ricardo Hernandez and

Motion to Continue Pretrial,
Trial, And Extend Deadlines -

Douglas McKinley, who do not object to continuing the pretrial conference and trial date.

The reason for this request is that the continuance is necessary to allow a reasonable amount of time to effectively prepare the case for trial pursuant to 18 U.S.C §3161(h)(7)(A) and 18 U.S.C. §3161(h)(7)(B)(i),(iv). Mr. Savala believes a continuance is necessary and acknowledges that any continuance would constitute excludable time under the Speedy Trial Act. Mr. Savala has signed a waiver of speedy trial in support of his request for a continuance, which will be filed with the Court.

Counsel for the Government and counsel for co-defendants Lopez Orduno, Garcia and Sanchez have no objection to the following proposed deadlines:

All pretrial motions, including discovery motions, <i>Daubert</i> motions, and motions <i>in limine</i> , filed	August 5, 2020
PRETRIAL CONFERENCE <i>Deadline for motions to continue trial</i>	Wednesday, September 9, 2020 1:30 PM - Yakima
CIs' identities and willingness to be interviewed disclosed to Defendant (if applicable)	September 14, 2020

Motion to Continue Pretrial,
Trial, And Extend Deadlines -
2

Grand jury transcripts produced to Defendant	
Case Agent:	September 14, 2020
CIs:	September 14, 2020
Other Witnesses:	September 14, 2020
Exhibit lists filed and emailed to the Court	September 21, 2020
Witness lists filed and emailed to the Court	September 21, 2020
Trial briefs, jury instructions, verdict forms, and requested voir dire filed and emailed to the Court	September 16, 2020
Exhibit binders delivered to all parties and to the Court	September 16, 2020
Delivery of JERS-compatible digital evidence files to the Courtroom Deputy	September 16, 2020
Trial notices filed with the Court	September 16, 2020
Technology readiness meeting (in-person)	September 21, 2020
JURY TRIAL	Monday, September 28, 2020 9:00 AM - Richland

Dated: May 27, 2020

Respectfully Submitted,

s/Adam R. Pechtel

Adam R. Pechtel/ WSBA #43743

Attorney for Defendant

Pechtel Law PLLC

21 N Cascade St

Kennewick, WA 99336

Telephone: (509) 586-3091

Email: adam@pechtellaw.com

Motion to Continue Pretrial,
Trial, And Extend Deadlines -
3

SERVICE CERTIFICATE

I certify that May 27, 2020, I electronically filed the foregoing with the District Court Clerk using the CM/ECF System, which will send notification of such filing to the following:

Stephanie A. Van Marter, Assistant United States Attorney

Jeremy B. Sporn, Attorney for Co-Defendant (1).

Douglas E McKinley, Attorney for Co-Defendant (2).

Ricardo Hernandez, Attorney for Co-Defendant (5).

s/Adam R. Pechtel
Adam R. Pechtel/ WSBA #43743
Attorney for Defendant
Pechtel Law PLLC
21 N Cascade St
Kennewick, WA 99336
Telephone: (509) 586-3091
Email: adam@pechtellaw.com